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Attorney for Kurtis Law

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
(HONORABLE MANUEL L. REAL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

KURTIS LAW,

Defendant.

Criminal No. 17cr00332-R

**NO HEARING REQUIRED**

**APPLICATION TO REMOVE ANKLE  
MONITORING DEVICE AND EXPAND  
CONDITIONS OF TRAVEL PRIOR  
TO SELF SURRENDER**

TO: NICOLA T. HANNA, UNITED STATES ATTORNEY,  
ERIK SILBER, ASSISTANT UNITED STATES ATTORNEY, and  
STACEY BARRIOS, UNITED STATES PRETRIAL SERVICES.

Counsel for Kurtis Law, Marisa L. D. Conroy, requests this Court issue an order to  
remove Mr. Law's ankle monitoring device and expand the conditions of travel for the  
reasons set forth in the attached Declaration of Counsel.

DATED: April 18, 2018

Respectfully submitted,

s/ Marisa L. D. Conroy  
MARISA L. D. CONROY  
Attorney for Kurtis Law

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
(HONORABLE MANUEL L. REAL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

KURTIS LAW,

Defendant.

Criminal No. 17cr00332-R

**DECLARATION OF COUNSEL FOR  
KURTIS LAW**

I, Marisa L. D. Conroy, under penalty of perjury, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and in the United States District Court for the Southern and Central Districts of California, and am admitted to practice before the United States Court of Appeals for the Ninth Circuit.
2. On January 24, 2018, I was appointed to represent the Defendant-Appellant, Mr. Law on appeal.
3. On May 2, 2017, Mr. Law made his initial appearance after being charged by the government with violations of 18 U.S.C. §§ 542 and 545.
4. On the same day, Mr. Law was released on a \$15,000 personal appearance bond guaranteed by his sister, Denise Law, acting as surety.

- 1 5. On July 17, 2017, Mr. Law pled guilty to count 1 of the indictment, a violation of 18  
2 U.S.C. § 545, Importing Wildlife Contrary to Law.
- 3 6. On October 16, 2017, this Court sentenced Mr. Law to 18 months custody, with six  
4 months to be served in home confinement prior to serving his custodial sentence.
- 5 7. On October 23, 2017, this Court corrected the prior sentence to impose a period of  
6 six months home confinement to be monitored by Pretrial Services, followed by a 12  
7 month sentence in the custody of the Bureau of Prisons.
- 8 8. This Court ordered Mr. Law to surrender to the designated facility by noon on April  
9 23, 2018.
- 10 9. On October 23, 2017, this Court modified the conditions of Mr. Law's pretrial  
11 release. The modified conditions released Mr. Law to Pretrial Services and required  
12 him to participate in a location monitoring program, requiring the use of an ankle  
13 bracelet. This Court also imposed the condition that Mr. Law remain confined to his  
14 home at all times, unless to meet with his attorney, attend court appearances, or attend  
15 a medical appointment.
- 16 10. Mr. Law has been designated to USP Tucson, located at 9300 S. Wilmot Road,  
17 Tucson, Arizona, 85756.
- 18 11. Mr. Law intends to fly to Tucson this coming weekend of April 21 to April 22, 2018,  
19 to ensure that he is able to self surrender by noon on April 23, 2018.
- 20 12. Mr. Law is requesting this Court expand his conditions of travel to include California  
21 and Arizona to allow him to travel to USP Tucson for his self surrender.
- 22 13. Mr. Law is also requesting this Court allow pretrial services to remove the ankle  
23 monitoring device on April 20, 2018, prior to Mr. Law flying to Arizona.
- 24 14. Mr. Law is currently released on a \$15,000 personal appearance bond, which can then  
25 be exonerated upon verification of his self surrender to USP Tucson.
- 26 15. On April 17, 2018, Erik Silber, counsel for the United States, indicated he preferred  
27 Mr. Law surrender to the United States Marshals in Los Angeles.
- 28

1 16. Accordingly, Mr. Law, through Counsel, requests this Court issue an order expanding  
2 his conditions of travel to include California and Arizona, and to allow Pretrial  
3 Services to remove the ankle monitoring device on April 20, 2018.

4 I so declare, this 18th day of April, 2018, in Encinitas, California.

5  
6 s/Marisa L. D. Conroy  
7 MARISA L. D. CONROY  
8 Declarant  
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PROOF OF SERVICE

I, the undersigned, declare that:

1. I am over eighteen years of age; am a resident of the County of San Diego, State of California; and my business address is P.O. Box 232726, Encinitas, CA 92023.
2. I am effecting service by electronically filing the foregoing with the Clerk of the District Court using its ECF system, which electronically notifies them;
3. I hereby certify that I mailed the foregoing, by United States Postal Service to the following non-ECF participants in this case:
  1. N/A

to the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2018.

/s/Marisa L. D. Conroy  
Marisa L. D. Conroy